

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X

UNITED STATES OF AMERICA

-v-

SABIRHAN HASANOFF,  
Defendant/Petitioner.

-----X

AFFIDAVIT IN SUPPORT OF SEALING THE ECF RECORD

STATE OF NEW YORK )

ss:

COUNTY OF NEW YORK )

B. ALAN SEIDLER, attorney for Petitioner Hasanoff Declares in support of this Motion to Seal:

1. I am the attorney for petitioner in this action in which he seeks to set aside his sentence pursuant to 28 USC @ 2255, of 200 months incarceration on Count One [Harboring or Concealing Terrorists, 18 USC @@ 2339B(a)(1), (d)(1)(D), (d)(1)(E), and 2], a consecutive 16 months incarceration on Count Two [Conspiracy to Defraud the United States]; a 3 year Supervised Release term; and a \$200 Special Assessment.

2. The @2255 motion was filed on or about September 30, 2014. Presently, an Order dated October 14, 2014, has been entered by the Court directing the Government to file its Answer, etc, by December 9, 2014, and the Hasanoff Reply is due January 5, 2014.

3. The case documents herein contain allegations concerning prior proceedings in the

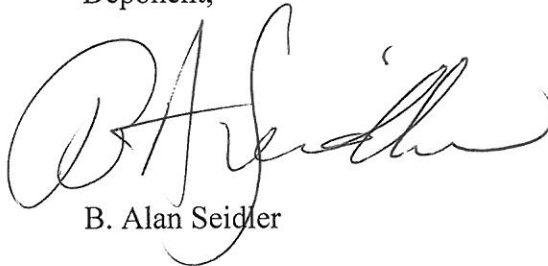
underlying criminal action that involve petitioner's relationship with the Government, and which if disclosed may jeopardize the safety of Petitioner. Consequently, petitioner requests the Electronic Case Filing system records be SEALED in this action.

4. No prior application has been made to any Court for this Recusal relief.

WHEREFORE, petitioner requests the Electronic Case Filing System Records be SEALED, and such other relief as is just and proper.

Dated: October 17, 2014.

Deponent,

A handwritten signature in black ink, appearing to read 'B. Alan Seidler', is written over the printed name.

B. Alan Seidler

Attorney for Hasanoff